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April 30, 2025

Via ECF:

The Honorable Paul A. Engelmayer, U.S.D.J. United States District Court Southern District of New York Thurgood Marshall U.S. Courthouse 40 Foley Square New York, NY 10007

Re: Olsson et al v. City of New York et al

Civil Docket No.: 1:25-cv-00346-PAE

Dear Judge Engelmayer:

We represent Krystal Olsson, individually and on behalf of all other persons similarly situated ("Plaintiff") in this FLSA Action, and we submit this letter motion, with the consent of counsel for the Defendants, to respectfully request that the Court adjourn the parties' upcoming Initial Conference, scheduled for May 13, 2025, at 2:00 p.m., as well as the parties' related Initial Conference submissions (ECF Dkt. 16).

By way of brief background, Plaintiff commenced this collective action against Defendants on January 14, 2025 (ECF Dkt. 1). On February 13, 2025, Your Honor granted Defendants' motion for an extension of time to respond to the complaint (ECF Dkt. 14), and Defendants filed their Answer on March 21, 2025 (ECF Dkt. 15).

The reason that the instant request to adjourn the parties' Initial Conference and related submission deadlines is being made, is that Plaintiff's counsel has a mediation scheduled in another matter pending in this Court on May 13, 2025, at 10:00 a.m., which is reasonably expected to extend for most, if not all, of that day. Moreover, this is Plaintiff's first request for an adjournment or for an extension of time in this matter, and a granting of this request will neither prejudice any party, nor affect any other scheduled dates in this matter.

In addition to providing their consent to the relief sought herein, Defendants note their unavailability on May 15, 2025; May 19, 2025; May 21, 2025; and June 4, 2025, for a new Initial Conference date to be scheduled.

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Therefore, we respectfully request that the Court adjourn the parties' Initial Conference from May 13, 2025, to another date not listed above, and extend the parties' deadline to submit their Civil Case Management Plan and Scheduling Order, their Joint Initial Conference Letter, and names of any counsel who wish to enter an appearance at the conference accordingly.

We thank the Court for its time and kind attention to this matter.

Respectfully Submitted,

Avraham Y. Scher, Esq.

<u>CC</u>: counsel of record for Defendants via ECF:

Conner Quinn, Esq.
New York City Law Department
Attorneys for Defendants
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New York, NY 10007

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GRANTED. The initial conference is hereby rescheduled to Wednesday, May 14, 2025, at 2 p.m.

SO ORDERED.

PAUL A. ENGE MAYER United States District Judge

Date: May 1, 2025